REMARKS

Claims 1-37 are pending in this application. No claims have been amended pursuant to the present Response.

In the Office Action, Claims 1-7, 9-14, 16-17, 19-20, 22-24, 26-30, 32 and 36-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Shaw et al.* (U.S. Patent No. 6,151,598). Claims 8, 15, 18, 21, 25, 33 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Shaw et al.* in view of *Izumi* (U.S. Patent No. 6,219,021 B1). Applicant respectfully traverses the rejections. Favorable reconsideration is respectfully requested.

Regarding the rejections of Claims 1, 16, 19, 22, 32, 34 and 36 as being obvious in view of *Shaw*, Applicant respectfully traverses. The present invention as claimed provides a method and apparatus, and program furnishing medium for allowing a user to edit a document by retrieving other information, including multimedia information, based upon user input information, such as hiragana, where the selection of multimedia information available to the user changes as the user inputs change. In contrast, the disclosure in *Shaw* relates to an architecture and setup of a digital dictionary with a communication system, with emphasis on development of "internal data structures including a set of high level language based procedural calls or instructions set sequences" for producing a system that optimizes run-time performance of the processing of document related data files, and for updating the digital dictionary with new vocabulary. (col. 3, line 55-col. 4, line 54).

Because *Shaw* is directed to the architecture and setup of the digital dictionary with the communication system, *Shaw* does not teach, contemplate or suggest displaying multimedia information to a user as selectable conversion candidate data as required by Claims 1, 11, 16, 19, 22, 32, 34 and 36. Instead, *Shaw* teaches a method for interconnecting document and multimedia equipment, which includes connecting display devices. (Col. 10, lines 13-20). The display devices referred to in *Shaw* do not teach, contemplate or suggest displaying multimedia information to a user as selectable conversion candidate data, as *Shaw* is directed towards the internal data structure and architecture of the digital dictionary with the communication system, for optimizing run-time performance of the system. Accordingly, Applicant respectfully requests that the obviousness rejection in view of *Shaw* be withdrawn regarding Claims 1, 11, 16, 19, 22, 32, 34 and 36. Furthermore, for the same or similar reasons as discussed above,

Applicant respectfully requests that the obviousness rejection in view of *Shaw* be withdrawn regarding Claims 28 and 37 as well.

In addition to the above discussion, the present invention is not obvious in view of *Shaw* for further reasons as detailed below. The "multimedia information identifier" of *Shaw,* referenced in the Office Action at page 4, is directed to "producing a selective multimedia representation or reference material." (Col. 9, lines 60-62). The multimedia information identifier is an internal data structure used for pointing to multimedia information. It is not a referencing table as claimed and further supported in the specification. Indeed, the Office Action confirms that *Shaw* does not disclose such "a multimedia information registration table in which a keyword associated with reading data in the word dictionary is associated with the multimedia information identifier representing the multimedia information identifier" as recited, for example, in Claims 1 and 24.

Furthermore, it does not make sense to "utilize a registration table to display the associations of multimedia information to the text" with the disclosure of *Shaw,* as this would require displaying a table to display internal data structures including a set of high level language based procedural calls or instruction set sequences to a user. Therefore, Applicant respectfully submits that the claims of the present invention are distinguishable and patentable over *Shaw* based on at least the reasons as discussed above.

Regarding the rejections of Claims 11, 28 and 37, the Office Action states at pages 10-11, that *Shaw* teaches "a multimedia reference pointer produces selective multimedia representation for the instances of the combination of characters" and also teaches a "means of retrieving a file based on forward coincidence retrieval." However, such pointer and retrieval relate exclusively to the execution of the internal processing within the communication system, and do not relate to the display of a registration table containing selectable multimedia information for retrieval from a storage means as claimed. In fact, nowhere does *Shaw* teach, suggest or contemplate a program furnishing medium for displaying referencing tables to a user for selection of multimedia information retrieval. Instead, as stated above, *Shaw* is directed to an architecture and setup of a digital dictionary with a communication system, for optimizing run-time performance of the processing of document related data files, and for updating the digital dictionary with new vocabulary. Therefore, Applicant respectfully submits that Claims 11, 28

and 37 are distinguishable and patentable over *Shaw* based on at least the reasons as discussed above.

Regarding the rejections of Claims 2-7, 9-10, 12-14, 17, 20, 23-24, 26-27, and 29-30, for at least the same reasons, *Shaw* does not teach, contemplate or suggest the features discussed above with respect to the independent claims. Applicant submits that dependent Claims 2-7, 9-10, 12-14, 17, 20, 23-24, 26-27, and 29-30 consequently are distinguishable and patentable as well over *Shaw*. Accordingly, Applicant respectfully requests that the obviousness rejection in view of *Shaw* be withdrawn.

Regarding the rejections of Claims 8, 15, 18, 21, 25, 31, 33 and 35 as being unpatentable over *Shaw* in view of *Izumi*, the Office Action states that *Izumi* teaches "a display control device in which a display panel is displaying ... data, ... [and] the user can pre-set the display sizes for the data to be displayed" and further states that it would have been obvious to combine the control device of *Izumi* with the system of *Shaw* to limit the amount of characters a user can input. Applicant respectfully disagrees with the Patent Office's position, as *Izumi* does not teach controlling the amount of data a user is allowed to input.

As such, Applicant respectfully submits that the combination of the control device of *Izumi* with the system of *Shaw* does not make sense, and is improper. Applicant respectfully submits that such a combination is improper because *Izumi* is directed towards controlling the physical size of data being displayed to a user, and *Shaw* does not contemplate or suggest controlling or displaying data on a display to a user. Even if properly combinable, this merely results in the system of *Shaw*, wherein user control is added to increase or decrease the display size of the data being displayed in *Shaw*. Further, as stated above, *Shaw* does not teach, suggest or contemplate displaying internal data structures including a set of high level language based procedural calls or instructions set sequences to a user. Instead, such data structures are to be communicated internally in a communication system architecture that allows for optimizing run-time performance of processing document related data files, and for updating the digital dictionary with new vocabulary. Therefore, Applicant respectfully submits that Claims 8, 15, 18, 21, 25, 31, 33 and 35 are distinguishable and patentable over *Shaw* and *Izumi*, alone or even if combinable. Accordingly, Applicant respectfully requests that the obviousness rejection in view of *Shaw* and *Izumi* be withdrawn.

In light of the above, Applicant respectfully submits that the present application is in condition for allowance and earnestly solicit reconsideration of same.

Respectfully submitted,

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